

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON TALCUM  
POWDER PRODUCTS MARKETING,  
SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-  
2738-FLW-LHG**

**MDL No. 2738**

***THIS DOCUMENT RELATES TO ALL  
CASES***

**Proposed Order**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2019, upon consideration of Plaintiff's Motion to Seal Certain Accompanying Exhibits to Plaintiffs' Steering Committee's Memoranda in Support of Certain Motions to Exclude Defendants' Expert Witnesses (CM/ECF \_\_\_\_\_), and any opposition thereto filed by Defendants, it is hereby ORDERED that the motion is GRANTED; and

IT IS FURTHER ORDERED that Exhibits designated in Appendix 1 to Plaintiffs' Motion to Seal shall be filed under seal and remain so until further order of Court; and

By the Court:

\_\_\_\_\_  
FREDA L. WOLFSON, USDJ